

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

WHOLE WOMAN'S HEALTH, *et al.*, )  
Plaintiffs, ) CIVIL ACTION  
v. ) CASE NO. 21-cv-00616-RP  
AUSTIN REEVE JACKSON, *et al.*, )  
Defendants. )

**PLAINTIFFS' MOTION TO EXCEED PAGE LIMITS FOR THEIR  
MOTION FOR SUMMARY JUDGMENT**

**TO THE HONORABLE COURT:**

Plaintiffs file this Motion for Leave to Exceed Page Limits for their Motion for Summary Judgment, and would show the Court as follows:

1. Plaintiffs are requesting this Court to grant summary judgment and declare that Texas Senate Bill 8 (“S.B. 8”) is unconstitutional and cannot lawfully be enforced, and to issue injunctive relief.

2. S.B. 8 poses multiple complex constitutional issues involving rights under the Fourteenth Amendment to the United States Constitution and the First Amendment to the United States Constitution and federal preemption. Plaintiffs seek leave to exceed the page limit to provide the Court with the necessary context for, and the argument and legal authorities in support of, their multiple claims.

3. Plaintiffs respectfully request that they be granted leave to exceed the 20-page limit in Local Rule CV-7(d). Plaintiffs' Motion for Summary Judgment and Memorandum in Support Thereof is 50 pages long.

WHEREFORE, Plaintiffs respectfully ask the Court to grant their Motion for Leave to Exceed Page Limits for Plaintiffs' Motion for Summary Judgment.

Dated: July 13, 2021

Respectfully submitted,

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\* *Pro hac vice applications forthcoming*

**CERTIFICATE OF SERVICE**

I certify that, on the 13th day of July, 2021, I electronically filed a copy of the above document with the Clerk of the Court using the CM/ECF system, and personally served all Defendants.

/s/ Christen Mason Hebert  
Christen Mason Hebert

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**[PROPOSED] ORDER GRANTING PLAINTIFFS'  
MOTION TO EXCEED PAGE LIMITS FOR  
THEIR MOTION FOR SUMMARY JUDGMENT**

Having considered Plaintiffs' Motion to Exceed Page Limits for their Motion for a Summary Judgment, and good cause being shown therefor,

IT IS HEREBY ORDERED that Plaintiffs' Motion is GRANTED.

Dated: \_\_\_\_\_

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UNITED STATES DISTRICT JUDGE